



HAZARDOUS SUBSTANCES FOSC FINANCIAL MANAGEMENT CHECKLIST

(For Coast Guard FOSC financial management ONLY; operational steps are NOT included)

When A Release Occurs

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Does CERCLA apply? ____yes ____no

If you answer yes to these three questions, CERCLA probably applies.

1. Has a hazardous substance been released (or is there substantial probability that it will be released)?
2. Does this present an imminent and substantial threat to public health or welfare?
3. Is the responsible party failing to take appropriate action, or is it necessary to monitor its actions?

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Collect incident information.

Name of incident: _____

Location: _____

Latitude and longitude: _____

Type of substance: _____

____ Visual Observation

____ Field testing

____ Lab analysis

____ Report by knowledgeable party

____ Other _____

Quantity of substance: _____

Description of substantial threat: _____

Potential quantity of total release: _____

Date of incident: _____

Date of discovery: _____



Collect source and responsible party information.

Name of facility or vessel:		_____
How was source identified?	_____	Visual Observation
	_____	Reported
	_____	Other _____
Who identified source?		_____
Responsible party (owner):	name	_____
	address	_____
	SSN/TIN*	_____
Responsible party (operator):	_____	
	contact	_____
	name	_____
	address	_____
Responsible party (other):	SSN/TIN*	_____

	contact	_____
	name	_____
How was RP identified?	_____	FOSC investigation
	_____	Report by RP
	_____	Report by third party _____

Who identified RP?		_____

* Social Security Number/Tax Identification Number (SSN/TIN). The Data Collection Act requires USCG to obtain the SSN or TIN of the RP in order to pursue cost recovery.



- ☐ **Estimate the CERCLA funding ceiling required.**

Estimated contractor costs: _____
Estimated FOSC personnel costs: _____
Estimated FOSC equipment costs: _____
Estimated TDY/travel costs: _____
Estimated miscellaneous costs: _____
Estimated OGA costs: _____
Estimated Reservist costs: _____
Estimate Strike Team costs: _____
Total ceiling required: _____

- ☐ **Access CANAPS for issuance of CPNs and authorized ceilings.**

CERCLA Project Number: _____
Authorized ceiling: _____
CPN accounting string: _____
Document Control Construction: _____

CANAPS will confirm by message.

- ☐ **If the estimated ceiling is equal to or greater than \$250,000, contact your NPFC Regional Manager for assistance in submitting an Action Memorandum to EPA before obligating the amount.**
- ☐ **If the estimated ceiling is less than \$250,000, document the finding of imminent and substantial endangerment in POLREP One.**
- ☐ **For NPFC assistance.**

Gulf Coast and Midwest:	Team I	(202) 493-6723
Southeast (Hampton Roads and South):	Team II	(202) 493-6726
West Coast, AK, HI:		
Northeast and Great Lakes:	Team III	(202) 493-6729
	Team IV	(202) 493-6732

On weekends, holidays, or after hours, you will hear recorded instructions for paging.

If your regional manager is not available, page the duty case officer by calling (800) 759-7243, PIN 2073906, **OR** call the duty case officer through the CGHQ Command Center (202) 267-2100 or (800) 424-8802. **If you are not able to contact NPFC, as the FOSC you may obligate up to \$25K for response actions.**



- ☐ Obtain information from your NPFC regional manager.

Assigned case officer: _____

- ☐ Locate the proper forms for ceiling management and for documenting all costs.

In the *NPFC User Reference Guide*, turn to Chapter 3, Subtab Resource Documentation.

Ceiling Management Forms:

_____ For all responses use **CG-5136F, Environmental Response Ceiling Management Form** to estimate and manage the ceiling. Record each activity as it occurs on **Daily Record Worksheets**.

Daily Cost Documentation Forms (all levels):

_____ Use the appropriate **Pollution Incident Daily Resource Reports** (CG-5136 series), or the Excel versions of these forms, to consolidate daily totals.

- ☐ Follow guidance in the *NPFC User Reference Guide* for use of funds and to arrange response actions. Contract through appropriate MLC (fcp) and use Pollution Removal Funding Authorizations (PRFA's) for other government agencies.



During Cleanup -- Every Day

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Monitor contractors.

- _____ Collect contractor **daily delivery tickets** and/or **Pollution Incident Daily Resource Reports**.
- _____ Within seven days of receipt of invoices, certify that work was performed as ordered. (As FOSC, you should not certify work that was not ordered.)
- _____ Within seven days of receipt of invoices, certify that work was performed as ordered. (As FOSC, you should not certify work that was not ordered.)
- _____ All invoices must be forwarded to arrive at MLC within 10 days of receipt.

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Monitor Coast Guard units.

- _____ Consolidate all daily reports for your unit onto the **Pollution Incident Daily Resource Reports**. This should cover all unit resources involved in removal activity.
- _____ Collect **Pollution Incident Daily Resource Reports** or official records (i.e. **aircraft utilization records** and **cutter navigation logs**) from other Coast Guard units.

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Monitor other government agencies.

- _____ Issue **Pollution Removal Funding Authorizations** (PRFAs) to other federal and state agencies participating in the FOSC-directed response. (See *NPFC User Reference Guide*, Chapter 3, Resource Documentation.)
- _____ Collect OGA (Other Government Agencies) **SF-1080** or **SF-1081** vouchers and supporting documentation in accordance with the PRFA. (See *NPFC User Reference Guide*, Chapter 3, Resource Documentation.)
- _____ Review **SF-1080/1081** vouchers from OGAs and certify that work was performed as ordered.

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Add up obligations and track them against the ceiling.

- Use the **Ceiling Management** forms in the *NPFC User Reference Guide*, Chapter 3, Subtab Resource Documentation:
- _____ Include Type I Obligations: contracts, removal authorizations, travel orders, direct expenses...
 - _____ Include Type II Obligations: **anticipated costs (estimates)** of Coast Guard resources (personnel, vehicles, aircraft, boats, cutters, and Strike Team pollution equipment) based on Coast Guard Standard Rates (See *NPFC User Reference Guide*, Section 3, Resource Documentation).
 - _____ Make sure that each POLREP includes the total ceiling authorized and cumulative obligations to date. (NPFC should be an INFO ADDEE for all POLREPs.)



Chapter 3: Removal Actions: Oil and Hazardous Substances

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If the ceiling must be increased, access CANAPS.

For example, if you have reached \$40K against a \$50K ceiling, and you expect the total costs to exceed \$50K, increase your ceiling to accommodate the anticipated needs of the response.

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Contact your NPFC case officer or the MLC contracting officer, as appropriate, any time you need assistance.



After the Response Action is Completed

- ☐ **Certify contractor invoices within ten working days of receipt of invoices.**

Insure that all certification for receipt of services is in accordance with standard MLC and Finance Center procedures. (Contact appropriate MLC contracting officer if questions arise, or if invoice cannot be certified. The FOSC is certifying receipt of invoiced goods and services in quantities indicated. Costs are verified by the cognizant contracting officer.)

- ☐ **Forward certified contractor invoices to MLCLANT (fcp-2) or MLCPAC (fcp), as appropriate.**

- ☐ **Keep copies of all certified contractor invoices for the unit's files.**

- ☐ **Compile an inventory of all equipment purchases.**

- ☐ **Within 120 days of completion of the cleanup, send the Financial Summary report to NPFC.**

See the *NPFC User Reference Guide*, Chapter 3, Subtab Resource Documentation, for a description of the Financial Summary report, which includes:

_____ Incident Report; FOSC Pollution Incident Daily Resource Reports; Contractor Invoices and Daily Resource Reports; Other Government Agencies Resource Documentation (SF-1080 with invoices, Daily Resource Reports, Pollution Removal Funding Authorization); Out-of-Pocket expense; Inventory of Equipment Purchased.

_____ If you are using Excel forms, DO NOT throw away the original handwritten invoices, dailies, and notes. In court, the Excel sheets may not be considered "original" documentation.

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